

ANDREA VALDEZ (Cal. Bar No. 239082)
530 S. Lake Avenue, No. 574
Pasadena, CA 91101
Tel: (626) 817-6547
andrea.valdez.esq@gmail.com

JOSEPH SCOTT ST. JOHN (*pro hac vice*)
514 Mockingbird Drive
Long Beach, MS 39560
Tel: 410-212-3475
jscottstjohnpublic@gmail.com

Attorneys for Objector Douglas W. St. John

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY
JOSEPH SCOTT ST. JOHN ISO
DOUGLAS W. ST. JOHN'S
OBJECTION TO REPORT AND
RECOMMENDATION RE:
OUTSTANDING MOTIONS**

This Document Relates To:
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

Special Master: Hon. Martin Quinn

I, Joseph Scott St. John, declare and state as follows:

1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in connection with the above-captioned matter.

2. I make this declaration in support of Objector Douglas W. St. John's Objection to Report and Recommendation Re: Outstanding Motions.

3. I have personal knowledge of the facts stated herein, and if called and sworn as a witness, I would testify truthfully as follows.

4. Exhibit 1 is a true and correct copy of the INDIRECT PURCHASER PLAINTIFFS' REPLY RE: MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS TO CLASS REPRESENTATIVES.

5. Exhibit 2 is a true and correct copy of the SUPPLEMENTAL DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS TO CLASS REPRESENTATIVES.

6. Exhibit 3 is a true and correct copy of OBJECTOR DOUGLAS W. ST. JOHN'S REPLY IN SUPPORT OF OBJECTION.

7. Exhibit 4 is a true and correct copy of the DECLARATION OF ATTORNEY JOSEPH SCOTT ST. JOHN ISO DOUGLAS W. ST. JOHN'S REPLY ISO HIS OBJECTION.

8. Exhibit 5 is a true and correct copy of the DECLARATION OF ATTORNEY ANDREA VALDEZ IN SUPPORT OF DOUGLAS W. ST. JOHN'S REPLY IN SUPPORT OF HIS OBJECTION.

9. Exhibit 6 is a true and correct copy of a letter from Mario Alioto to Special Master Quinn dated December 13, 2015.

10. Exhibit 7 is a true and correct copy of a letter from Francis Scarpulla and Josef Cooper to Special Master Quinn dated December 14, 2015.

1 11. Exhibit 8 is a true and correct copy of SPECIAL MASTER'S ORDER RE (1)
2 LEAD COUNSEL'S REQUEST FOR FURTHER BRIEFING; (2) HEARING FOR ORAL
3 ARGUMENT; (3) OBJECTORS FINN/FORTMAN MOTION FOR PRODUCTION OF FEE
4 AGREEMENTS.

5 12. Exhibit 9 is a true and correct copy of the INDIRECT PURCHASER
6 PLAINTIFFS' REPLY RE: FINAL APPROVAL OF SETTLEMENTS WITH THE PHILIPS,
7 PANASONIC, HITACHI, TOSHIBA, SAMSUNG SDI, TECHNICOLOR, AND
8 TECHNOLOGIES DISPLAYS AMERICAS DEFENDANTS.

9 13. Exhibit 10 (FILED UNDER SEAL) is a true and correct copy of the
10 DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT PURCHASER
11 PLAINTIFFS' REPLY RE: FINAL APPROVAL OF CLASS ACTION SETTLEMENTS WITH
12 THE PHILIPS, PANASONIC, HITACHI, TOSHIBA, SAMSUNG SDI, THOMSON AND TDA
13 DEFENDANTS together with its Exhibits.

14 14. Exhibit 11 is a true and correct copy of an email chain.

15 15. Exhibit 12 is a true and correct copy of an ex parte email between the Special Master,
16 IPP Lead Counsel, and select objectors. This email was not served on all objectors until January 4,
17 2015.

18 16. Exhibit 13 is a true and correct copy of a NOTICE OF HEARING.

19 17. Exhibit 14 is a true and correct copy of the MOTION TO STRIKE SUR-REPLY
20 EVIDENCE.

21 18. Exhibit 15 is a true and correct copy of the INDIRECT PURCHASER
22 PLAINTIFFS' OPPOSITION TO MOTION TO STRIKE SUR- REPLY EVIDENCE.

23 19. Exhibit 16 is a true and correct copy of the MOTION FOR PERMISSION TO
24 FILE REPLY IN SUPPORT OF OBJECTIONS TO LEAD COUNSEL'S MOTIONS FOR
25 FINAL APPROVAL AND ATTORNEYS' FEES.

26 20. Exhibit 17 is a true and correct copy of INDIRECT PURCHASER PLAINTIFFS'
27 OPPOSITION TO ROBERT BONSIGNORE'S MOTION FOR PERMISSION TO FILE
28 REPLY IN SUPPORT OF OBJECTIONS; REQUEST TO STRIKE.

21. Exhibit 18 is a true and correct copy of ORDER DENYING LEAVE TO FILE
LATE REPLY.

22. Further declarant sayeth not.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED
STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana this 4th day of February, 2016.

/s/ Joseph Scott St. John

Joseph Scott St. John